

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<p>AIG EUROPE S.A. a/s/o UNILEVER UNITED STATES, INC. and CONOPCO, INC. d/b/a UNILEVER, UNILEVER UNITED STATES, INC., and CONOPCO, INC.,</p> <p style="text-align: center;">Plaintiffs,</p> <p>v.</p> <p>C&amp;S WHOLESALE GROCERS, INC. and A.E.D.S LLC,</p> <p style="text-align: center;">Defendants</p>	<p>Case No: 3:21-CV-01212-JFS</p> <p><b>JURY TRIAL DEMANDED</b></p>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------

**SECOND MOTION TO ENLARGE TIME TO FILE A RESPONSIVE PLEADING OF  
DEFENDANT, C&S WHOLESALE GROCERS, INC.**

1. Defendant, C&S Wholesale Grocers, Inc. (“C&S”), respectfully requests that this Honorable Court enlarge the time for the filing of C&S’s response to Plaintiff’s Amended Complaint through November 22, 2021.

2. C&S’s response is currently due on November 16, 2021.

3. C&S and Plaintiff are continuing to conduct good-faith settlement negotiations but need an additional several days in order to, it is hoped, finalize their negotiations.

4. Plaintiff’s Amended Complaint is composed of 74 paragraphs. It would take significant time and money for C&S to prepare the response. These resources could be saved if the parties resolve the case through settlement.

5. Settlements are to be encouraged and resources should be conserved if possible.

7. Plaintiff’s counsel has consented to an extension through November 22, 2021, should this Honorable Court be disposed to grant same.

**CERTIFICATE OF CONCURRENCE**

The undersigned counsel for Defendant, C&S Wholesale Grocers, Inc., hereby certifies that on November 15, 2021, 2021, he conferred with counsel for Plaintiffs regarding Defendant's Motion to Enlarge Time to File a Responsive Pleading. Plaintiff concurs with said Motion.

Respectfully submitted,

LEWIS BRISBOIS BISGAARD & SMITH

/s/ Donald H. Smith

Donald H. Smith (PA I.D. 41011)

One PPG Place | 28<sup>th</sup> Floor

Pittsburgh, PA 15222

[donald.smith@lewisbrisbois.com](mailto:donald.smith@lewisbrisbois.com)

Tel: (412) 567-5596

Fax: (412) 567-5494

**CERTIFICATE OF SERVICE**

I, Donald H. Smith, hereby certify that a true and correct copy of the foregoing Motion to Enlarge Time to Respond to Plaintiff's Complaint on behalf of Defendant C&S Wholesale Grocers, Inc. was electronically served on all counsel on November 15, 2021 via the Court's ECF system.

/s/ Donald H. Smith  
Donald H. Smith  
Counsel for Defendant,  
C&S Wholesale Grocers, Inc.